



April 30, 2026

US Environmental Protection Agency, Region II  
290 Broadway  
New York, NY 10007-1866  
Attn: Mr. Patrick Peck, Project Officer

Dear Mr. Peck:

**RE: EPA Cooperative Agreement–Cleanup Grant 4B96218700**  
**EPA Cooperative Agreement – RLF Grant 4B96236900**  
Brownfields Cleanup Decision Memorandum  
Judge Robert Johnson Park  
8<sup>th</sup> Street and Carl Miller Boulevard  
Blocks 520, 522, 523; Lot 26, 9 (partial), 13  
City of Camden, Camden County, New Jersey

The Camden Redevelopment Agency (CRA) is pleased to submit this Brownfields Cleanup Decision Memorandum (Decision Memo) to the U.S. Environmental Protection Agency (USEPA), in accordance with the referenced Cooperative Agreement.

This memorandum presents the steps leading to the selection of a remedial approach at the referenced site. The memorandum is organized as follows:

- Section 1 – an introduction,
- Section 2 - a summary of the Analysis of Brownfields Cleanup Alternatives (ABCA),
- Section 3 – a description of the selected remedial approach, and
- Section 4 – a demonstration that the selected remedial approach achieves regulatory compliance and attains the cleanup goals.

## **1. INTRODUCTION**

### **Background**

The site, Robert B. Johnson Park is located at 723 Carl Miller Boulevard, comprising approximately 14.7 acres across Block 520, Lot 26, Block 522, Lot 9 (partial), and Block 523, Lot 13 as described by the City of Camden for tax purposes (“Subject Property”). Robert B. Johnson Park is a public park in Camden owned by the City of Camden. The subject property is currently improved as a public park with open space, basketball courts, and ball fields.

The U.S. Environmental Protection Agency (USEPA) has awarded the City of Camden a \$1,000,000 Cleanup grant (2023) and the Camden Redevelopment Agency a 2022 RLF Grant of which \$500,00 subgrant and a loan (amount to be determined) has been allocated to the site to support environmental remediation activities. The CRA has entered into an agreement with the

USEPA (Cooperative Agreement No. 4B96236900), as well as the City of Camden (Cooperative Agreement 4B96218700), which provide the terms and conditions for use of the brownfields cleanup grant funds, including a commitment to provide for community involvement in the site remediation process.

In accordance with those terms and conditions, the City of Camden Redevelopment Agency (CRA) on behalf of the City produced a work plan describing cleanup tasks to be completed, including project deliverables. Project deliverables include the ABCA and this Decision Memo, among other documents. The CRA produced the draft ABCA, dated November 2022, and the final on April 2026 and submitted the document to the USEPA. A summary of the ABCA is presented below, in Section 2.

Based on the analyses provided in the ABCA, including the open public meeting held in November 2022; consultation with the State regulatory authority (NJDEP) and the Licensed Site Remediation Professional (LSRP) charged with overseeing cleanup activities at the site; and the entirety of the administrative record for the site, the remedial approach for the site has been selected, as presented in this Decision Memo.

## **2 SUMMARY OF ABCA**

The purpose of the ABCA is to identify, evaluate, and compare the reasonable alternatives for addressing the contamination identified at the Site. The ABCA presents information regarding site description, site environmental conditions, applicable laws and standards, and an evaluation of selected remedial alternatives. These items are summarized in this section.

### **2.1 Site Description**

Currently, the City of Camden is listed as the owner of all three lots comprising Judge Robert Johnson Park. According to review of historic aerial photographs and Sanborn® Fire Insurance Maps, the majority of the Subject Property has remained undeveloped since the late 1800's with the exception of the far southern end of the property fronting Carl Miller Boulevard. The southern end of the Subject Property was improved with primarily residential dwellings beginning around 1906. As the years progressed, some commercial and light industrial use structures were erected along Carl Miller Boulevard. In the late 1960's, all Site structures were razed to support the development of the existing Robert B. Johnson Park. The Park has been improved with various upgrades throughout the years.

The Subject Property encompasses 14.7 acres of playing fields, basketball courts and associated improvements, located in the Liberty Park neighborhood of Camden City, New Jersey. The site is located in a mixed use area consisting primarily of residential use with some light commercial use properties. The Property is bordered by residential properties on the northeastern and southern sides and enclosed by Interstate 676 to the west, Thurman Street to the north, Carl Miller Boulevard to the south and South 8th Street to the east. The Isabel Miller Community Center is located on the eastern portion of Block 522, Lot 9, which is a portion of the Lot not included as part of the Subject Property of this ABCA.

## 2.2 Site Environmental Conditions

The site is currently an active case with NJDEP. A Preliminary Assessment (PA) was completed by French and Parello Associates in September 2021 for the Camden County Department of Parks (CCDP).

Based on a review of the historic aerial photographs and other research, it appears that dumping and/or or filling activities have occurred at the Subject Property since at least 1940 to approximately the mid 1950's, specifically in the rear two-thirds of the Site. The New Jersey Geologic Survey Historic Fill of the Camden Quadrangle shows the northern two-thirds of the Subject Property is mapped as containing historic fill. Further, prior reports note that the rear two-thirds of the property (where the filling is shown to have occurred) is situated at an elevation approximately 10 feet higher compared to the front portion of the property.

Based on these findings a Site Investigation performed in February 2022 for CCDP was focused on the historic filling and/or dumping activities, the presence of a former junkyard at the southern end of the Subject Property and the potential for heating oil underground storage tanks (USTs) associated with the structures formerly present along Carl Miller Boulevard.

Analytical results for the 2021 and 2022 soil samples reported the following classifications of compounds above a Non-Residential (ingestion-dermal or inhalation pathway) Soil Remediation Standards (SRS) in multiple samples: semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and metals. These classes of compounds were detected throughout the Site, including in samples collected to investigate non-Historic Fill AOCs (AOC 2, 3, and 4).

Impacted soil was identified at depths ranging from 0.0-0.5 feet bgs to 19.5-20.0 feet bgs. 16 of the 26 samples collected in the top 1.0 foot of soil reported at least one compound concentration above a Non-Residential SRS. 11 of the 29 samples collected deeper than 1.0-foot bgs reported at least one compound concentration above a Non-Residential SRS. The distribution of the compounds of concern, including detections in samples collected to investigate other AOCs, is reflective of the presence of Historic Fill throughout the Site.

The soil investigative work completed to date, specifically the number, location, depth, and laboratory analysis requested, provides sufficient data and information to develop a Remedial Action Workplan and associated cost estimate. Remedial action will be required for only AOC-1: Historic Fill Material.

## 2.3 Applicable Laws and Cleanup Standards

All site remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10C-1 et seq.; the Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12 and implementing regulations in the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C; and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. The most current versions of the NJDEP Technical Guidance documents will be referenced, including:

- *Soil SI/RI/RA*

- *Ground Water SI/RI/RA*
- *Capping of Sites Undergoing Remediation,*

The reference remediation standards for soil will be NJDEP's published numeric values for the Ingestion/Dermal Non-Residential exposure pathway (IDNR), Ingestion/Dermal Residential exposure pathway (IDR), Inhalation Residential exposure pathway (IHR), Inhalation Non-Residential exposure pathway (IHNR), and Migration to Ground Water exposure pathway (MGW) (NJAC 7:26D).

The effective implementation of the applicable laws and guidance will be managed and overseen by a Licensed Site Remediation Professional (LSRP) retained for the site. Any Response Action Outcome (RAO, i.e., NFA-equivalent) for the site will be issued by the LSRP. Project reports, RAOs, etc. will be submitted on behalf of the City to the NJDEP, which retains the authority to audit the project and/or review and potentially reject any documents submitted.

#### **2.4 Analysis of Cleanup Alternatives**

The ABCA presents an evaluation of several potential cleanup scenarios for the site. The following evaluation criteria were considered in comparing the remedial alternatives:

- Effectiveness in providing compliance with NJDEP regulations and increased protectiveness to public health and the environment;
- Implementability of the considered alternative;
- Cost of the considered alternative; and
- Sustainability and resilience considerations.

Based on these criteria and giving consideration to site characteristics, surrounding environment, land-use restrictions, potential future uses, and cleanup goals, the "Site-wide Soil Capping of Historic Fill Material" as the preferred remedial approach. The preferred remedial approach is described in Section 3 of this Decision Memo.

Subsequent to the publication of a Draft ABCA, the City solicited and received public comment (as documented in the Final ABCA). A summary of the public comments received is appended to the Final ABCA document. No public comments expressed objection to, or disagreement with, the preferred remedial action.

### **3 SELECTED ENVIRONMENTAL CLEANUP PLAN**

#### **3.1 Remedial Approach: Site-wide Soil Capping of Historic Fill Material**

The remedial action will include keeping almost all of the historic fill on site, regrading of the site as appropriate with the proposed park improvements, and capping the historic fill material with either 12 inches of clean fill/topsoil or impervious surfaces to serve as the cap per NJDEP SRP guidance. Site improvements incorporated with specific cut and fill areas as prescribed ground cover (ball courts, turf field, parking) will be incorporated as part of the cap design.

The goals of this alternative will be to minimize construction and public disruptions at the park, minimize or eliminate the need to remove and dispose of impacted historic fill from the Site, identify existing acceptable current or proposed (park development) cover conditions that may minimize the need to import clean fill, and minimize costs of removal and disposal.

This remediation will include an Engineering Control and Institutional Control (recording of a deed notice for the historic fill material).

This remedy will prevent exposure to residual site contaminants. Further details of the remediation plan would include:

- Excavated soils for off site disposal, if needed, will be sampled and characterized in accordance with the requirements of the designated disposal facility. The tasks will also include procurement and the emplacement of clean backfill.
- Restore site to a condition suitable for complete final restoration.
- All fill material will be compliant with the NJDEP Fill Material Guidance for SRP Sites, dated April 2015 (Version 3.0), and documentation of compliance will be provided in the final Remedial Action Report. Ultimately, the final remedial action including the engineered cap will be completed upon development of the Site.
- The ongoing protectiveness of the engineering controls will be ensured by adherence to the NJDEP approved Soil Remedial Action Permit. The cap will be monitored via regular cap inspections, on a schedule provided in the Soil Remedial Action Permit. Biennial certifications will be submitted to the NJDEP.
- The Institutional Controls will consist of a deed notice attached to the deed in perpetuity. The deed notice will provide notice of the contaminants and the concentrations that were left in place, and controlled by the cap.

Selection of this alternative will result, upon completion, in restricted future use of the Site.

### **3.2 Selection Rationale**

This approach complies with restricted-use remediation standards and achieves project remediation goals by:

- Achieving compliance with the NJDEP Rules.
- Significantly reducing the potential for human exposure to residual site soil contaminants.

## **4 Regulatory Compliance and Achievement of Cleanup Goals**

### **4.1 Regulatory Framework**

The site will be remediated per regulations as set forth in the Technical Requirements for Site Remediation (TRSR) N.J.A.C. 7:26E.

NJDEP's published numeric values for the Ingestion/Dermal Non-Residential exposure pathway (IDNR), Ingestion/Dermal Residential exposure pathway (IDR), Inhalation Residential exposure pathway (IHR), Inhalation Non-Residential exposure pathway (IHNR), and Migration to Ground Water exposure pathway (MGW) (NJAC 7:26D).

The effective implementation of the applicable laws and guidance will be managed and overseen by the LSRP currently retained for the site. Any Response Action Outcome (RAO, i.e., NFA-equivalent) for the site will be issued by the LSRP. Project reports, RAOs, etc. will be submitted

on behalf of the City to the NJDEP, which retains the authority to audit the project and/or review and potentially reject any documents submitted.

#### **4.2 Achievement of Cleanup Goals**

The goal of the project is to address historic fill contamination in order to provide improvements for the public open space, green infrastructure and recreational ballfields.

#### **4.3 Limitations**

Following remediation, limited contamination will still exist, though the cap will significantly reduce the potential for human exposure. Future site owners, occupants, and the general public will be provided notice of site environmental conditions by means of the Deed Notice.

### **5 Closing**

This Decision Memo was prepared with the assistance of the City's technical consultant, Brownfield Redevelopment Solutions, Inc. (BRS). Please contact the BRS project managers listed below, or the undersigned, with any questions regarding this document.

BRS Project contacts:

Jennifer Taylor  
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Sincerely,



Olivette Simpson,  
Executive Director, Camden Redevelopment Agency

Attachment

cc: Michele Christina, BRS  
Jennifer Taylor, BRS  
Alison Devine, BRS

**Attachment A – Site Location Map**



PROJECT	
CAMDEN REDEVELOPMENT AGENCY	
SITE PLAN	
AREA OF CONCERN MAP	
PROJECT #	
DATE	
DRAWN BY	
CHECKED BY	
DATE	
SCALE	
SHEET #	
TOTAL SHEETS	
PROJECT #	
DATE	
DRAWN BY	
CHECKED BY	
DATE	

  

LEGEND	
[Green Fill]	AOC-1 HISTORIC FILL
[Pink Outline]	AOC-2 HISTORIC BUILDING
[Yellow Outline]	AOC-3 FORMER SEWER YARD
[Blue Outline]	AOC-4 POTENTIAL RESIDENTIAL USE
[Dashed Line]	APPROXIMATE PROPERTY BOUNDARY
[Red Dashed Line]	APPROXIMATE SITE BOUNDARY